



**West Coast Office**

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Mr. Arthur Neal  
Director, Program Administration  
National Organic Program  
USDA-AMS-TMO-NOP  
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Washington, DC 20250

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August 12, 2005

Re. Sunset Review (Docket # TN-04-07) comments

Dear Mr. Neal and National Organic Standards Board:

The Hain Celestial Group, Inc. hereby submits comments in reference to the National Organic Program, Sunset Review, Docket number TM-04-07.

- The Hain Celestial Group, Inc. currently has over 900 “organic” and “made with organic” products in the market.
- We use most of the non-agricultural substances up for review that are listed in 205.605 (a) and (b).

- We are not aware of any satisfactory alternatives to the 205.605 (a) and (b) substances.
- As the board is aware, the non-agricultural substances currently up for review on the National List were given a thorough TAP review and authorized after lengthy discussions. Currently, we are not aware of any changes from a food science perspective that would make it possible to eliminate non-agricultural substances from processed Organic foods.
- As such, we fully support the continued allowance of substances listed in 205.605 (a) and 205.605 (b) and request that the NOSB review and approve those substances currently up for review.

**(a) NON-SYNTHETICS:**

Acids (Alginic; Citric - produced by microbial fermentation of carbohydrate substances; and Lactic).

Animal enzymes – (Rennet - animals derived; Catalase – bovine liver; Animal lipase; Pancreatin; Pepsin; and Trypsin).

Bentonite.

Calcium carbonate.

Calcium chloride.

Colors, nonsynthetic sources only.

Dairy cultures.

Diatomaceous earth - food filtering aid only.

Enzymes--must be derived from edible, nontoxic plants, nonpathogenic fungi, or nonpathogenic bacteria.

Flavors, nonsynthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative.

Kaolin.

Magnesium sulfate, nonsynthetic sources only.

Nitrogen - oil-free grades.

Oxygen--oil-free grades.

Perlite--for use only as a filter aid in food processing.

Potassium chloride.

Potassium iodide.

Sodium bicarbonate.

Sodium carbonate.

Waxes - nonsynthetic (Carnauba wax; and Wood resin).

Yeast - nonsynthetic, growth on petrochemical substrate and sulfite waste liquor is prohibited (Autolysate; Bakers; Brewers; Nutritional; and Smoked - nonsynthetic smoke flavoring process must be documented).

**(b) SYNTHETICS:**

Alginates.

Ammonium bicarbonate - for use only as a leavening agent.

Ammonium carbonate - for use only as a leavening agent.

Ascorbic acid.

Calcium citrate.

Calcium hydroxide.

Calcium phosphates (monobasic, dibasic, and tribasic).

Carbon dioxide.

Chlorine materials - disinfecting and sanitizing food contact surfaces, Except, That, residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act (Calcium hypochlorite; Chlorine dioxide; and Sodium hypochlorite).

Ethylene - allowed for post-harvest ripening of tropical fruit and degreening of citrus.

Ferrous sulfate - for iron enrichment or fortification of foods when required by regulation or recommended (independent organization).

Glycerides (mono and di) - for use only in drum drying of food.

Glycerin - produced by hydrolysis of fats and oils.

Hydrogen peroxide.

Lecithin - bleached.

Magnesium carbonate - for use only in agricultural products labeled "made with organic (specified ingredients or food group(s))," prohibited in agricultural products labeled "organic."

Magnesium chloride - derived from sea water.

Magnesium stearate - for use only in agricultural products labeled "made with organic (specified ingredients or food group(s))," prohibited in agricultural products labeled "organic."

Nutrient vitamins and minerals, in accordance with 21 CFR 104.20, Nutritional Quality Guidelines For Foods.

Ozone.

Pectin (low-methoxy).

Phosphoric acid - cleaning of food-contact surfaces and equipment only.

Potassium acid tartrate.

Potassium tartrate made from tartaric acid.

Potassium carbonate.

Potassium citrate.

Potassium hydroxide - prohibited for use in lye peeling of fruits and vegetables except when used for peeling peaches during the Individually Quick Frozen (IQF) production process.

Potassium iodide - for use only in agricultural products labeled "made with organic (specified ingredients or food group(s))," prohibited in agricultural products labeled "organic."

Potassium phosphate - for use only in agricultural products labeled "made with organic (specified ingredients or food group(s))," prohibited in agricultural products labeled "organic."

Silicon dioxide.

Sodium citrate.

Sodium hydroxide - prohibited for use in lye peeling of fruits and vegetables.

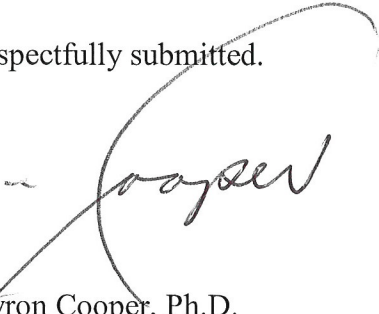
Sodium phosphates - for use only in dairy foods.

Sulfur dioxide - for use only in wine labeled "made with organic grapes," Provided, That, total sulfite concentration does not exceed 100 ppm.

Tocopherols - derived from vegetable oil when rosemary extracts are not a suitable alternative.

Xanthan gum.

Respectfully submitted.

A handwritten signature in cursive script, appearing to read "Myron Cooper", is written over a large, faint, circular scribble.

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